

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

In re: CRISS LORENZO FLOWERS,	:	Case No. 15-57700
	:	Chapter 13
Debtor.	:	Judge C. Kathryn Preston

**MOTION OF DEBTOR CRISS LORENZO FLOWERS TO
MODIFY THE AMENDED CHAPTER 13 PLAN (DOCUMENT NO. 16)**

Now comes Debtor CRISS LORENZO FLOWERS, by and through the undersigned counsel, and hereby respectfully requests that this Honorable Court enter an order modifying the Chapter 13 Plan, pursuant to 11 U.S.C. Section 1329(a) and Fed.R.Bankr.P. 3015(g). A memorandum in support of this Motion is set forth below.

MEMORANDUM IN SUPPORT

In support of said Motion, the Debtor respectfully requests the following modification to the Amended Chapter 13 Plan (Document No. 16):

1. That the future earnings of the Debtor are submitted to the supervision and control of the Trustee and the Debtor shall pay the Trustee the sum of \$815.00 per month for months one through twelve (1-12); \$915.00 per month for months thirteen through twenty-four (13-24); \$1,415.00 per month for months twenty-five through thirty-six (25-36); \$1,515.00 per month for months thirty-seven through forty-eight (37-48); and then, \$1,715.00 per month for months forty-nine through the duration of the plan of repayment (49-end);
2. That the dividend paid to the general unsecured creditors shall remain at one percent (1%);
3. That the Chapter 13 Plan was confirmed on 18 February 2016;
4. That all other provisions of the Chapter 13 Plan shall remain in full force and effect; and,
5. That the Debtor submits that said proposed modification does not adversely affect the rights of creditors or other parties in interest in this case.

Respectfully submitted,

/s/ Mark Albert Herder

Mark Albert Herder (0061503)
Attorney for the Debtor
MARK ALBERT HERDER, LLC
1031 East Broad Street
Columbus, Ohio 43205
Tel.: 614.444.5290
Fax: 614.444.4446
markalbertherder@yahoo.com

**NOTICE OF MOTION TO MODIFY
THE AMENDED CHAPTER 13 PLAN**

Debtor CRISS LORENZO FLOWERS has filed papers with the Court -- a Motion to Modify Debtor's Chapter 13 Plan.

YOUR RIGHTS MAY BE AFFECTED. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. If you do not have an attorney, you may wish to consult one.

If you do not want the Court to grant the relief sought in the Motion, then on or before twenty-one (21) days from the date set forth in the certificate of service for the Motion, you or your attorney must:

1. File with the Court a responsive memorandum explaining your position by mailing your response by regular U.S. Mail to Clerk, United States Bankruptcy Court, 170 North High Street, Columbus, Ohio 43215 OR your attorney must file a response using the court's ECF system;
2. The Court must **receive** your response on or before the date set forth above; and,
3. Send a copy of your responsive memorandum either by regular U.S. Mail or the court's ECF system to:

United States Trustee
170 North High Street, Suite 200
Columbus, Ohio 43215

Frank M. Pees, Chapter 13 Trustee
130 East Wilson Bridge Road, Suite 200
Worthington, Ohio 43085

Mark Albert Herder, LLC
1031 East Broad Street
Columbus, Ohio 43205

If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the Motion and may enter an order granting that requested relief.

CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that a true and accurate copy of the preceding Motion was duly served this date on the following registered ECF participants, electronically through the Court's ECF system at the email address registered with the Court:

Asst. U.S. Trustee (Col) – via ECF

Frank Pees, Chapter 13 Trustee – via ECF

and on the following by **ordinary U.S. Mail** addressed to:

Criss Lorenzo Flowers, 1368 Smith Road, Columbus, OH 43207

Dated: 07 December 2016

/s/ Mark Albert Herder

Mark Albert Herder (0061503)
Attorney for the Debtor
MARK ALBERT HERDER, LLC
1031 East Broad Street
Columbus, Ohio 43205
Tel.: 614.444.5290
Fax: 614.444.4446
markalbertherder@yahoo.com

/s/ Criss Lorenzo Flowers

Criss Lorenzo Flowers
Debtor